7700 Earhart Blvd HazMat Site Cleanup Response Plan

Situation:

The Louisiana Department of Environmental Quality (LDEQ) is overseeing the clean-up of the former Thompson-Hayward Chemical Company (THCC) site located at 7700 Earhart Boulevard, New Orleans, LA. The site dating back to 1931, was formally used for the formulation, warehousing, and distribution of pesticide products, soda ash material, and dry cleaning fluids. All industrial/commercial activities ended at the site in 1988. Detailed information about the remedial activities, etc. can be found on the LDEQ web site at: http://www.deq.louisiana.gov/portal/Default.aspx?tabid=2584.

The general timetable for work is:

- Early October, site prep;
- Mid October December structure demolition;
- December April Subsurface remedial activities;
- Work hours are to be restricted to 7:00 am -6:00 pm.

Shaw Environmental & Infrastructure, Inc. (Shaw) will be providing on-site environmental monitoring and documentation.

Chemicals of concern in the soil include (there are no indications in the documentation of chemicals in buried containers, however there may be pools of chemicals trapped underground):

- Perchloroethylene;
- 2.4 D;
- Dimethylamine;
- Parathion.

Site General Info:

- Approximately 2.7 acres;
- Contains one structure which is to be demolished;
- Contains contaminated soil covered by asphalt pavement:
- Surrounded by a chain link fence with mesh limiting visibility into the site;
- A site security guard is stationed at the main gate on Burdette Street;
- Soil remediation may extend in excess of 10 feet deep.

Purpose:

While this is a private worksite with hazardous waste personnel and equipment on site, it is the duty of the City of New Orleans to provide for the protection of persons in the area around the site in the event of a release of dangerous chemicals into the air or water. This

plan is written as an adjunct to the documents previously mentioned on the LDEQ web site and will be used by the City public safety personnel in the event a response is needed.

Concept of the Operation:

As previously stated, this is a private clean-up operation with environmental monitoring being conducted by Shaw. The City's responsibilities include public protective measures (shelter-in-place and/or evacuation), as well as traffic control and access control in the event of a significant chemical release. The following is the emergency plan taken directly from the Shaw document:

An Air Monitoring Plan has been approved by the LDEQ to monitor perimeter concentration levels. If there is a failure in the procedures and controls presented in the Air Monitoring Plan the following plan will be implemented to protect, notify, and evacuate the surrounding community. The means of determining if a situation requires emergency action and the procedures to carry out in the event of an emergency are detailed in this response.

Selection of the appropriate health-based protective level was based on a review of available public exposure guidelines, described in Attachment C, and consideration of site-related constituent concentrations. Because perchloroethylene (tetrachloroethylene) is the constituent found most frequently and at the highest concentrations on-site and, in addition, has the lowest public exposure guideline levels, the AEGL-1 for this constituent was selected as the level of concern (LOC) upon which to base public notification and protection procedures. The AEGL-1 level is lower than the ERPG-1 level for PCE. In addition, AEGL levels are applicable to the general population, including infants and children, and other individuals who may be susceptible. The AEGL-1 for perchloroethylene is 35 ppm for durations of 10 minutes to 8 hours.

For site air monitoring purposes, total VOC monitoring will be performed and results will be conservatively assumed to be entirely PCE unless compound-specific information can be obtained. If total VOC monitoring indicates levels of 35 ppm that are sustained for 60 minutes and compound-specific information cannot be obtained, then the public will be notified to shelter-in-place until such time as the VOC level decreases to less than 35 ppm and that lower level is sustained for 60 minutes. If after 4 hours of sheltering-in-place the VOC concentration remains at 35 ppm or if at any time during sheltering-in-place the VOC concentration continues to rise and sustains 75 ppm for one hour, the public will be notified to prepare for evacuation and evacuation procedures will be implemented. The upper level of 75 ppm was selected as the action level for evacuation because it is less than the AEGL-2 levels for PCE and the AEGL-1.

Before work begins, the 24-hour hotline will be equipped with the capacity to record an automated message that will allow residents to call and check the status of an emergency situation. If an emergency of the above stated magnitude exists and the notification and evacuation plan is enacted, the automated message shall be updated hourly to inform residents of the status of the emergency. If the emergency no longer poses any threat, the automated message will be updated accordingly.

Special Needs

Within two blocks of the site (450 feet), there is a complex operated by the Catholic Diocese which contains a nursing home (Chateau de Notre Dame, housing for the nuns, a Seminary with dorms, and Mary St. Dominican School. Given the nature of these facilities, special attention would be needed both for sheltering in place and if an evacuation were to be required. In addition, the residents of the nursing home would present a more sensitive population in regards to health effects.

Shelter

In the event an evacuation is necessary, the New Orleans Recreation Dept. facility at St Bernard Recreation Center, 1500 Lafreniere St. (70122), will be utilized as a shelter. Shelter operations will be conducted by the American Red Cross, as specified in Annex 6 (ESF 6) in the Comprehensive Emergency Management Plan (CEMP).

In the highly unlikely event the release could affect the Chateau de Notre Dame nursing home at 2832 Burdette Street, the nursing home has internal plans for in-place sheltering as well as evacuation plans. In addition to emergency power and food for sheltering-in-place, they have Memorandums of Understanding (MOUs) for transportation and housing in the event they have to evacuate.

Notifications and Response Actions

Level I: If VOC levels exceed 35 ppm – this will be an alert notification only and no actions will be taken beyond Shaw passing on the information to the project's Office of Emergency Preparedness contact, Soraya Flores-Arias, who will notify the New Orleans Fire Dept. Hazardous Materials Team, the New Orleans Police Dept. and Emergency Medical Services. The New Orleans Fire Dept. Hazardous Materials Team may however send representatives to assess the situation if they deem appropriate.

Level II: If VOC levels exceed 35 ppm for one hour – again notifications will be made to the above, as well as the Arch Diocese – at this level New Orleans Public Safety will respond. The New Orleans Fire Dept. will establish a joint command with Shaw or their representatives; the New Orleans Police Dept. will verify the door to door notifications of the potentially affected residences and ascertain if they need assistance. They also will secure the perimeter as necessary.

Page: 3 1/2/07

Emergency Medical Services will alert the hospital(s) and liaison with the Arch Diocese and with the unified command. Based on the recommendations from the unified command, the New Orleans Recreation Dept. and the Regional Transit Authority may be placed on stand-by in the event an evacuation is anticipated.

Level III: If VOC levels remain over 35 ppm for over 4 hours or exceed 75 ppm for one hour, or if the levels continue to rise greater than 75 ppm, evacuation may be ordered. This notification will be made from the unified command. At this level all parties will be notified and the Emergency Operations Center will be partially activated with representatives from those organizations reporting. Also note that the LDEQ mandated that if a shelter-in-place is required on a hot and humid day, the shelter in-place time will only be one (1) hour before an evacuation is required.

Direction and Control:

Notifications from Shaw: The Office of Emergency Preparedness director will serve as the coordinator between the City of New Orleans and Shaw, and should be notified of any unusual event. In the event of fire, injury or other emergency, call 911 first, then The Office of Emergency Preparedness.

In the event this plan is activated, the New Orleans Fire Dept. Hazardous Materials Team will send personnel to liaison with the on-scene personnel and assess the situation. If necessary they will establish a unified command and provide support to the Shaw staff until the immediate danger has been mitigated.

Emergency Contacts:

(0, 0)	1		
Shaw (On-Site)		504-861-0574	
LDEQ		504-861-1373	
Shaw Environmental	Michael T. Oubre	504-861-0574	Mike.Oubre@shawgrp.com
& Infrastructure, Inc.			
New Orleans Fire	Bruce Martin	504-329-1522	bmartin@cityofno.com
Dept.			
Emergency Medical	Cedric Palmisano	504-671-3969	cpalmisano@cityofno.com
Services			
LA Dept of Health &	Cynthia Matherne	504-214-1059	
Hospitals			
New Orleans Police	Chief Marlon Defillo	504-416-3325	madefillo@cityofno.com
Dept.	Sgt Aaron Blackwell	504-228-3845	ajblackwell@cityofno.com
Office of Emergency	Jerry Sneed	504-628-9035	jwsneed@cityofno.com
Preparedness Director	-		
Office of Emergency	Matt Kallmyer		mkallmyer@cityofno.com
Preparedness Deputy			
Director			
Emergency Operations	Ken Fisher	870-329-0270	lfisher@gpworldwide.com
Center Coordinator			
Office of Emergency	Jay Bowden	615-354-4054	jbowden@gpworldwide.com
Preparedness			

Operations			
Office of Emergency	Jeffrey Merryman	863-860-1917	jemerryman@cityofno.com
Preparedness Logistics			
Office of Emergency	Soraya Flores-Arias	504-416-7752	sfarias@cityofno.com
Preparedness			
Executive Assistant			
Catholic Diocese	S. Harry Cooper	504-866-2741	hcooper@archdioces-no.org
(Chateau de Notre		Notre Dame	
Dame & Campus)		504-347-0777	
		Wynhoven	
American Red Cross	Bill Salmeron	504-915-8229	bsalmeron@arcno.org
	Brooke Tranchina	504-915-8333	
	Main Chapter Phone	504-620-3105	
Lafayette Elementary		504-862-5730	
School	Principle		+
ESF 6	Thelma French	504-228-4348	thelma_french@nops.k12.la.us
Regional Transit	Gerald Guter	504-390-3643	
Authority ESF 1	James Tillie	504-908-3727	jtillie@norta.com
New Orleans	Larry Barabino	504-382-3902	
Recreation Dept.	Mr. Dexter	504-382-3902	
Unisys	Walt Burns	303-263-9681	Walt.burns@unisys.com
MOT/ Emergency	Carlos Muniz	504-485-1451	cmuniz@cityofno.com
Operations Center			

Communications: Handheld Midland GXT661 radios will be utilized on-site by Shaw.

The New Orleans Fire Dept. assigns a tactical channel (typically Fireground 6) at the time of the incident based on the location and any simultaneous events.

Public Information Hotline: THAN and the LDEQ have established a hotline for residents to call for updated information. That number is (504) 861-1373.

Service and Support:

As previously stated, the American Red Cross will provide the required resources to manage and operate the shelter. Transportation assistance will be provided by the Regional Transit Authority with security provided by the New Orleans Police Dept. The New Orleans Recreation Dept. is only to provide access to the facility.

In the event additional resources are needed, the Office of Emergency Preparedness will be the primary contact for additional logistics or other support from the City.

LtCol Jerry W. Sneed

Director Office of Emergency Preparedness



